

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

MICHELLE E. COOPER,)	
)	
Plaintiff,)	
)	Cause No: 4:15-cv-00012-RLW
vs.)	
)	
METROPOLITAN LIFE INSURANCE)	
COMPANY and METLIFE, INC.,)	
)	
Defendants.)	

MOTION TO CONSIDER PLAINTIFF'S DISCOVERY REQUEST AND TO EXTEND

SCHEDULING DEADLINES

COMES NOW Plaintiff, by counsel, and for her Motion to Consider Plaintiff's Discovery Request and to Extend Scheduling Deadline states to the Court as follows:

1. Plaintiff filed her Motion for Discovery on April 20, 2015, pursuant to the Case Management Order dated March 6, 2015 (Doc. #23). The motion requests evidence beyond the administrative record, which Defendants have produced.
2. Plaintiff consented to Defendant's Motion to Extend their deadline to respond on May 13, 2015 (Doc. #27) and again on June 8, 2015 (Doc. #32). Defendant's response to Plaintiff's Motion for Discovery was filed on June 23, 2015 (Doc. #35).
3. This Court has not yet ruled on Plaintiff's Motion for Discovery.
4. The parties were given an extension to complete ADR (Doc. #38) and the compliance report was filed on August 28, 2015 (Doc. #39). ADR was unsuccessful.
5. The parties consented to extend the deadline for filing Dispositive Motions to September 11, 2015. (Doc. #40).

6. In an attempt to resolve their dispute regarding discovery, on September 4, 2015, counsel for the parties have discussed the dispute by phone and Plaintiff has presented Defendants with a more narrow, specific discovery request. Plaintiff expects a response from Defendants within a short time.
7. Plaintiff is unable to file any dispositive motions and is unable to respond to Defendant's dispositive motions without a ruling on her Motion for Discovery.
8. Given the number of extensions of the schedule deadlines, Plaintiff requests that the discovery deadline be extended until her Motion for Discovery has been considered by the Court.
9. Further, Plaintiff requests that the Scheduling Order be amended according to the Court's ruling on limited discovery.

WHEREFORE, Plaintiff prays this Court enter an Order for Plaintiff to allow limited discovery, for an Order extending the time in which to complete the discovery, and for an Amended Scheduling Order regarding all dispositive motions.

RYNEARSON SUESS SCHNURBUSCH
CHAMPION, LLC.

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 4th day of September, 2015, a copy of the above and foregoing was filed electronically with the Clerk of the Court, using CM/ECF system, which sent notification of such filing to:

Ms. Ann E. Buckley

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